

EXHIBIT C

Leonard Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**DECLARATION OF MELISSA A. LEONARD IN SUPPORT OF
DEBTORS' APPLICATION TO RETAIN AND EMPLOY RICHARDS, LAYTON
& FINGER, P.A. AS CO-COUNSEL EFFECTIVE AS OF THE PETITION DATE**

I, Melissa A. Leonard, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am the Executive Vice President, General Counsel & Secretary of the above-captioned debtors and debtors in possession (each a “**Debtor**” and, collectively, the “**Debtors**” or the “**Company**”). I submit this declaration (the “**Declaration**”) in support of the application (the “**Application**”)² for authority to retain and employ Richards, Layton & Finger, P.A. (“**RL&F**”) as co-counsel for the Debtors effective as of the Petition Date. Except as otherwise noted, I have personal knowledge of the matters set forth herein, information gathered from my review of relevant documents and information supplied to me by other members of the Debtors’ personnel and the Debtors’ advisors.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

THE DEBTORS' SELECTION OF RL&F AS CO-COUNSEL

2. As noted in the Application, the Debtors seek to retain White & Case LLP (“W&C”) as their bankruptcy co-counsel in connection with these chapter 11 cases. Upon determining that these chapter 11 cases would be filed in the United States Bankruptcy Court for the District of Delaware, W&C recommended to the Debtors that the Debtors retain RL&F as their bankruptcy co-counsel based on, among other things, the firm’s extensive experience and knowledge in the field of debtors’ and creditors’ rights, business reorganizations and liquidations under chapter 11 of the Bankruptcy Code, its expertise, experience and knowledge in practicing before this Court, its proximity to the Court and, because it is a Delaware based law firm, its ability to respond quickly to emergency hearings and other emergency matters. Based on W&C’s recommendation, the Debtors’ knowledge and experience with RL&F and the Debtors’ discussions with its other advisors, the Debtors evaluated and selected RL&F as bankruptcy co-counsel. Under the circumstances, the Debtors did not believe it was necessary to interview or consider other firms to serve as bankruptcy co-counsel. As such, the Debtors believe that RL&F is uniquely qualified to represent them in these chapter 11 cases.

RATE STRUCTURE

3. In my capacity as Executive Vice President, General Counsel & Secretary of the Debtors, I, and others acting under my direction, are responsible for, among other things, supervising the costs of outside counsel retained by the Debtors in the ordinary course of business. In my experience working with other outside law firms for the Debtors and on other matters, I believe that RL&F’s rates are comparable to the rates of firms similar to RL&F. I, and others acting under my direction, are also responsible for reviewing the invoices regularly submitted by RL&F, and I understand that the hourly rates RL&F charged the Debtors in the prepetition period

are the same as the hourly rates RL&F will charge the Debtors during these chapter 11 cases, subject to annual and customary firm-wide adjustments in the ordinary course of RL&F's business.

COST SUPERVISION

4. RL&F and the Debtors are developing a prospective budget and staffing plan for the first interim fee period in these chapter 11 cases. The Debtors recognize that in large chapter 11 cases such as these, it is possible there may be unforeseen fees and expenses that will need to be addressed by the Debtors and RL&F. The Debtors also recognize it is their responsibility to closely monitor the billing practices of RL&F and their other counsel to ensure that fees and expenses paid by their estates remain consistent with the Debtors' expectations taking into account the exigencies of these chapter 11 cases. To that end, the Debtors will continue to review and monitor the regular invoices submitted by RL&F and, together with RL&F, periodically amend the budget and staffing plans to reflect developments in the cases as applicable.

5. The Debtors will continue to monitor the fees and expense reimbursement process during these chapter 11 cases and ensure the Debtors are an active participant in that process. Recognizing that every chapter 11 case is unique, the Debtors, together with RL&F, will utilize the budgeting process to provide guidance on the period of time involved and the level of attorneys and professionals who will work on various matters, as well as the projection of average hourly rates for the attorneys and professionals for such matters.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Dated: July 6, 2023

/s/ *Melissa A. Leonard*

Melissa A. Leonard
Executive Vice President,
General Counsel & Secretary
Lordstown Motors Corp., *et al.*